

EXHIBIT A

JULIO GARZA
NATIONAL OILWELL VARCO V. GARZA

July 09, 2022

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<p>1 UNITED STATES DISTRICT COURT</p> <p>2 SOUTHERN DISTRICT COURT OF TEXAS</p> <p>3 HOUSTON DIVISION</p> <p>4 _____)</p> <p>5 NATIONAL OILWELL VARCO, L.P.,)</p> <p>6 Plaintiff,)</p> <p>7 VS) Case No.</p> <p>8 JULIO GARZA,) 4:22-CV-02006</p> <p>9 Defendant.)</p> <p>10 _____)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15 VIDEOTAPED ORAL DEPOSITION OF JULIO GARZA</p> <p>16 JULY 9, 2022</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24 REPORTED BY:</p> <p>25 Lisa J. Brannon, CSR, RPR, CRR</p>	<p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 APPEARING ON BEHALF OF PLAINTIFF:</p> <p>4 Stuart Lapp, Esq.</p> <p>5 Joshua Redelman, Esq</p> <p>6 STIBBS & CO., P.C.</p> <p>7 750 William D. Fitch Parkway</p> <p>8 Suite 210</p> <p>9 College Station, Texas 77845</p> <p>10 Telephone: 281-367-2222</p> <p>11 Email: slapp@stibbsco.com</p> <p>12 jredelman@stibbsco.com</p> <p>13</p> <p>14 APPEARING ON BEHALF OF DEFENDANT:</p> <p>15 Adam Israel, Esq.</p> <p>16 BALCH & BINGHAM, LLP</p> <p>17 811 Louisiana Street</p> <p>18 Suite 1010</p> <p>19 Houston, Texas 77002</p> <p>20 Telephone: 205-226-3495</p> <p>21 E-mail: aisrael@balch.com</p> <p>22</p> <p>23 ALSO PRESENT:</p> <p>24 Barrett Parker, videographer</p> <p>25</p>
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<p>1 VIDEOTAPED ORAL DEPOSITION OF JULIO GARZA,</p> <p>2 produced as a witness at the instance of the</p> <p>3 Plaintiff, and duly sworn, was taken in the</p> <p>4 above-styled and above-numbered cause on the 9th</p> <p>5 day of July, 2022, from 9:03 a.m. to 12:20 p.m.,</p> <p>6 before Lisa J. Brannon, CSR, RPR, CRR, reported</p> <p>7 by machine shorthand via Zoom, pursuant to the</p> <p>8 Federal Rules of Civil Procedure and the</p> <p>9 provisions stated on the record.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 I N D E X</p> <p>2 PAGE</p> <p>3 Appearances..... 3</p> <p>4 WITNESS: JULIO GARZA</p> <p>5 Examination by Mr. Lapp..... 7</p> <p>6 Certification of Deponent.....112</p> <p>7 Reporter's Certificate.....114</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1	P R O C E E D I N G S
2	THE VIDEOGRAPHER: Good morning
3	we're on the record. Today's date is July 9th,
4	2022, and the current time right now is 9:03 a.m.
5	This is the videotaped deposition of Julio Garza.
6	Counsel, will you please introduce
7	yourself and the witness will be sworn.
8	MR. LAPP: My name is Suart Lapp
9	L-a-p-p, I am counsel for the plaintiff, National
10	Oilwell Varco.
11	MR. REDELMAN: Josh Redelman,
12	counsel for plaintiff, National Oilwell Varco.
13	MR. ISRAEL: I'm Adam Israel,
14	counsel for the defendant.
15	JULIO GARZA,
16	having been first duly sworn, testified as
17	follows, to wit:
18	EXAMINATION
19	BY MR. LAPP:
20	Q. Mr. Garza, would you state your name
21	for the record, please.
22	A. My name is Julio Garza.
23	Q. Mr. Garza, I understand you live in
24	Tempe, Arizona. Is that right?
25	A. Yes, sir.

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1	Q. Okay. When did you get to Houston for
2	this deposition?
3	A. Last night.
4	Q. Who paid for your plane ticket?
5	A. I drove with my family.
6	Q. And you still have a house here in
7	Houston, do you not?
8	A. I do not.
9	Q. Where are y'all staying?
10	A. At a hotel.
11	Q. Were you in Houston on June 29th, 2022?
12	A. I don't recall, but how long ago was
13	that? About a week ago?
14	Q. Last week, last Wednesday.
15	A. Yes.
16	Q. You were in Houston?
17	A. Yes.
18	Q. Why weren't you at the temporary
19	preliminary injunction hearing in federal court
20	that day?
21	A. My lawyer suggested --
22	MR. ISRAEL: I'm going to object.
23	To the extent that we're going to get into
24	communications between Mr. Garza and his counsel,
25	I'll direct him not to answer to the extent the

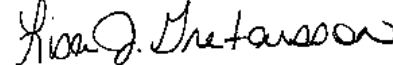
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<p style="text-align: right;">Page 9</p> <p>1 answer divulges any communications between you 2 and your attorneys. 3 THE WITNESS: Okay. 4 Q. (BY MR. LAPP) So you were in town. 5 A. Yes. 6 Q. You knew that there was a hearing that 7 day. 8 A. Correct. 9 Q. You know that you are the defendant in 10 this lawsuit. 11 A. Correct. 12 Q. You knew that there was going to be 13 evidence taken at that hearing. 14 A. I wasn't aware. 15 Q. Was it your choice, or somebody else's 16 choice, that you not appear at the hearing? 17 MR. ISRAEL: Again, I'll object 18 just to the extent that this gets into the legal 19 strategy of the case between Mr. Garza and his 20 attorneys. 21 Q. (BY MR. LAPP) You can answer the 22 question. 23 A. I was not subpoenaed to show up. 24 Q. I understand you're on paid 25 administrative leave with Array, correct?</p>	<p style="text-align: right;">Page 11</p> <p>1 Q. Where were you at 10 o'clock in the 2 morning? 3 A. Here in this office. 4 Q. Was your family with you at that -- on 5 that trip as well? 6 A. No. 7 Q. And did you drive in or fly in for 8 that? 9 A. I flew in. 10 Q. And who paid for your plane ticket? 11 A. I did. 12 Q. Who's paying for your attorney fees in 13 this case? 14 A. My company is. 15 Q. Array Technologies? 16 A. Yes, sir. 17 Q. And just for the record, it's true -- 18 Array Technologies, Inc., in Albuquerque, New 19 Mexico, is your current employer, correct? 20 A. I believe so. 21 Q. And when did you go to work for them? 22 A. I can't recall the exact date, but it 23 was probably a month ago, or two. 24 Q. May of 2022? 25 A. Maybe. I can't recall. I don't -- I</p>
<p style="text-align: right;">Page 10</p> <p>1 A. Yes. 2 Q. And are you receiving your full 3 compensation, a full salary while on paid 4 administrative leave? 5 A. Correct, yes. 6 Q. What's your address in Tempe? 7 A. 1277 West Myrna Lane. 8 Q. ZIP code? 9 A. 85284. 10 Q. Do you know your Texas driver's license 11 number? 12 A. Not by memory. 13 Q. Do you have a Texas driver's license? 14 A. I still do, yes. I also have an 15 Arizona one now. 16 Q. All right. Do you have either one of 17 those on your person this morning? 18 A. It's not in the room but it's nearby. 19 Q. Okay. It's not important enough to go 20 get it so we'll move on. 21 When you were here on the 29th of 22 -- here in Houston, Texas on the 29th of June, 23 2022, where were you at 1:30 p.m. in the 24 afternoon? 25 A. I was here in this office.</p>	<p style="text-align: right;">Page 12</p> <p>1 don't remember the dates. 2 Q. I think we'll probably look at some 3 documents this morning to refresh your memory. 4 A. Okay. 5 Q. What is your position at Array 6 Technologies? 7 A. I'm a senior mechanical engineer for 8 mechanical systems. 9 Q. And has that been your position since 10 you started there? 11 A. Yes. 12 Q. Who is your boss? 13 A. Todd Andersen. 14 Q. And what is Mr. Andersen's position? 15 A. He is chief engineer. 16 Q. Is he in Tempe, or is he somewhere 17 else? 18 A. He's somewhere else. 19 Q. And where is he? 20 A. I believe he's in Utah. 21 Q. Do you know where in Utah? 22 A. No, sir. 23 Q. Do you perform the services that you 24 perform for Array in Tempe, Arizona? 25 A. Chandler.</p>

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<p>1 I, JULIO GARZA, have read the foregoing 2 deposition and hereby affix my signature that 3 same is true and correct, except as noted above.</p> <p style="text-align: center;">_____ JULIO GARZA</p> <p>4 THE STATE OF TEXAS) 5 COUNTY OF _____)</p> <p>6 Before me, _____, on this day 7 personally appeared JULIO GARZA, known to me (or 8 proved to me under oath or through 9 _____) (description of identity card or 10 other document) to be the person whose name is 11 subscribed to the foregoing instrument and 12 acknowledged to me that they executed the same 13 for the purposes and consideration therein 14 expressed.</p> <p>15 Given under my hand and seal of office this 16 ____ day of _____, 2022.</p> <p>17 _____</p> <p>18 NOTARY PUBLIC IN AND FOR 19 THE STATE OF TEXAS</p> <p>20 21 22 23 24 25</p>	<p>1 I do further certify that I am neither 2 a relative nor employee nor attorney nor counsel 3 of any of the parties to this action, and that I 4 am neither a relative nor employee of such 5 attorney or counsel, and that I am not 6 financially interested in the action.</p> <p>7 Certified to by me this 11th day of 8 July, 2022.</p> <p>9 10  11 Lisa J. Gretarsson, CSR, RPR, CRR</p> <p>12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 114</p> <p>1 STATE OF TEXAS) 2 COUNTY OF TARRANT)</p> <p style="text-align: center;">REPORTER'S CERTIFICATE</p> <p>3 I, Lisa J. Brannon, CSR, RPR, CRR, do 4 hereby certify that prior to the commencement of 5 the examination, JULIO GARZA was duly sworn by me 6 to testify to the truth, the whole truth, and 7 nothing but the truth.</p> <p>8 I do further certify that the foregoing 9 is a verbatim transcript of the testimony as 10 taken stenographically by and before me at the 11 time, place, and on the date hereinbefore set 12 forth, to the best of my ability.</p> <p>13 I further certify that the signature of 14 the deponent: 15 _____ 16 was requested by the deponent or a 17 party before the completion of the deposition and 18 that the signature is to be before any notary 19 public and returned within 30 days from date of 20 receipt of the transcript. If returned, the 21 attached Changes and Signature Page contains any 22 changes and the reasons therefore; 23 _____ was not requested by the deponent 24 or a party before the completion of the 25 deposition.</p>	